

EXHIBIT 31

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (WMW/DTS)

Plaintiff,

v.

FEDERAL INSURANCE COMPANY,
an Indiana corporation,

**DEFENDANT'S RESPONSE TO
PLAINTIFF'S SECOND SET OF
REQUESTS FOR PRODUCTION OF
DOCUMENTS**

Defendant.

To: Plaintiff and its attorneys, Allen Hinderaker, Heather Kliebenstein and Michael A. Erbele, Merchant & Gould P.C., 3200 IDS Center, 80 South Eighth Street, Minneapolis, MN 55402.

Defendant Federal Insurance Company ("Federal"), for its Response to Plaintiff's Second Set of Requests for Production of Documents, states and alleges as follows:

GENERAL RESPONSES

1. Federal objects to the Definitions and Instructions to the extent that they seek to impose obligations on Federal that either exceed, or are different from, what is required under the Federal Rules of Civil Procedure, District of Minnesota Local Rules, and the Stipulated E-Discovery Order.
2. Federal objects to the requests to the extent that they seek information protected from discovery under the attorney-client privilege or work product doctrine.
3. Federal's responses and objections are made to the best of Federal's present knowledge, information, and belief. Federal's responses and objections are limited to information within its possession, custody, or control. Federal reserves the right to

REQUEST NO. 55: All documents relating to the decision to implement the application known as CSI Express, including all documents relating to the business benefits to be derived from the implementation and the efficiencies to be realized from using the application.

RESPONSE: Federal objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case because it seeks “all” documents and is unlimited in time. Federal also objects to this request as vague and overbroad because it seeks all documents “relating to the business benefits” and “efficiencies to be realized from using the application.” Federal also objects to this request as vague and overbroad because it seeks documents that have no bearing on the claims and defenses in this action. Federal further objects to this request to the extent that it seeks documents and information protected from discovery under the attorney-client privilege and work product doctrine.

REQUEST NO. 56: All documents relating to the decision to implement or considerations to implement the application known as CSI/Upsell Simulator, including all documents relating to the business benefits to be derived from the implementation and the efficiencies to be realized from using the application.

RESPONSE: Federal objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case because it seeks “all” documents and is unlimited in time. Federal also objects to this request as vague and overbroad because it seeks all documents “relating to the business benefits” and “efficiencies to be realized from using the application.” Federal also objects to this request as vague and overbroad because it seeks documents that have no bearing on the claims and defenses in this action. Federal further objects to this request to the extent that it seeks documents and

information protected from discovery under the attorney-client privilege and work product doctrine.

REQUEST NO. 57: All documents relating to the decision to implement the application known as Decision Point, including all documents relating to the business benefits to be derived from the implementation and the efficiencies to be realized from using the application.

RESPONSE: Federal objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case because it seeks “all” documents and is unlimited in time. Federal also objects to this request as vague and overbroad because it seeks all documents “relating to the business benefits” and “efficiencies to be realized from using the application.” Federal also objects to this request as vague and overbroad because it seeks documents that have no bearing on the claims and defenses in this action. Federal further objects to this request to the extent that it seeks documents and information protected from discovery under the attorney-client privilege and work product doctrine.

REQUEST NO. 58: All documents relating to the decision to implement the application known as Automated Renewal Process, including all documents relating to the business benefits to be derived from the implementation and the efficiencies to be realized from using the application.

RESPONSE: Federal objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case because it seeks “all” documents and is unlimited in time. Federal also objects to this request as vague and overbroad because it seeks all documents “relating to the business benefits” and “efficiencies to be realized from using the application.” Federal also objects to this request as vague and overbroad

because it seeks documents that have no bearing on the claims and defenses in this action. Federal further objects to this request to the extent that it seeks documents and information protected from discovery under the attorney-client privilege and work product doctrine.

REQUEST NO. 59: All documents relating to the decision to implement the application known as CUW, including all documents relating to the business benefits to be derived from the implementation and the efficiencies to be realized from using the application.

RESPONSE: Federal objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case because it seeks “all” documents and is unlimited in time. Federal also objects to this request as vague and overbroad because it seeks all documents “relating to the business benefits” and “efficiencies to be realized from using the application.” Federal also objects to this request as vague and overbroad because it seeks documents that have no bearing on the claims and defenses in this action. Federal further objects to this request to the extent that it seeks documents and information protected from discovery under the attorney-client privilege and work product doctrine.

REQUEST NO. 60: All documents relating to the decision to implement the application known as IRMA, including all documents relating to the business benefits to be derived from the implementation and the efficiencies to be realized from using the application.

RESPONSE: Federal objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case because it seeks “all” documents and is unlimited in time. Federal also objects to this request as vague and overbroad because it

seeks all documents “relating to the business benefits” and “efficiencies to be realized from using the application.” Federal also objects to this request as vague and overbroad because it seeks documents that have no bearing on the claims and defenses in this action. Federal further objects to this request to the extent that it seeks documents and information protected from discovery under the attorney-client privilege and work product doctrine.

REQUEST NO. 61: All documents relating to the decision to implement the application known as TAPS, including all documents relating to the business benefits to be derived from the implementation and the efficiencies to be realized from using the application.

RESPONSE: Federal objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case because it seeks “all” documents and is unlimited in time. Federal also objects to this request as vague and overbroad because it seeks all documents “relating to the business benefits” and “efficiencies to be realized from using the application.” Federal also objects to this request as vague and overbroad because it seeks documents that have no bearing on the claims and defenses in this action. Federal further objects to this request to the extent that it seeks documents and information protected from discovery under the attorney-client privilege and work product doctrine.

REQUEST NO. 62: All documents relating to the decision to implement the application known as Premium Booking, including all documents relating to the business benefits to be derived from the implementation and the efficiencies to be realized from using the application.

RESPONSE: Federal objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case because it seeks “all” documents and is unlimited in time. Federal also objects to this request as vague and overbroad because it seeks all documents “relating to the business benefits” and “efficiencies to be realized from using the application.” Federal also objects to this request as vague and overbroad because it seeks documents that have no bearing on the claims and defenses in this action. Federal further objects to this request to the extent that it seeks documents and information protected from discovery under the attorney-client privilege and work product doctrine.

REQUEST NO. 63: All documents relating to the decision to implement the application known as CIS Claims, including all documents relating to the business benefits to be derived from the implementation and the efficiencies to be realized from using the application.

RESPONSE: Federal objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case because it seeks “all” documents and is unlimited in time. Federal also objects to this request as vague and overbroad because it seeks all documents “relating to the business benefits” and “efficiencies to be realized from using the application.” Federal also objects to this request as vague and overbroad because it seeks documents that have no bearing on the claims and defenses in this action. Federal further objects to this request to the extent that it seeks documents and information protected from discovery under the attorney-client privilege and work product doctrine.

REQUEST NO. 64: All documents relating to the decision to implement the application known as Cornerstone, including all documents relating to the business benefits to be derived from the implementation and the efficiencies to be realized from using the application.

RESPONSE: Federal objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case because it seeks “all” documents and is unlimited in time. Federal also objects to this request as vague and overbroad because it seeks all documents “relating to the business benefits” and “efficiencies to be realized from using the application.” Federal also objects to this request as vague and overbroad because it seeks documents that have no bearing on the claims and defenses in this action. Federal further objects to this request to the extent that it seeks documents and information protected from discovery under the attorney-client privilege and work product doctrine.

REQUEST NO. 65: All documents relating to the decision to implement the application known as Adapt-ABL, including all documents relating to the business benefits to be derived from the implementation and the efficiencies to be realized from using the application.

RESPONSE: Federal objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case because it seeks “all” documents and is unlimited in time. Federal also objects to this request as vague and overbroad because it seeks all documents “relating to the business benefits” and “efficiencies to be realized from using the application.” Federal also objects to this request as vague and overbroad because it seeks documents that have no bearing on the claims and defenses in this action. Federal further objects to this request to the extent that it seeks documents and

information protected from discovery under the attorney-client privilege and work product doctrine.

REQUEST NO. 66: All documents relating to the decision to implement the application known as Evolution, including all documents relating to the business benefits to be derived from the implementation and the efficiencies to be realized from using the application.

RESPONSE: Federal objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case because it seeks “all” documents and is unlimited in time. Federal also objects to this request as vague and overbroad because it seeks all documents “relating to the business benefits” and “efficiencies to be realized from using the application.” Federal also objects to this request as vague and overbroad because it seeks documents that have no bearing on the claims and defenses in this action. Federal further objects to this request to the extent that it seeks documents and information protected from discovery under the attorney-client privilege and work product doctrine.

REQUEST NO. 67: All documents relating to the decision to implement the application known as EZER, including all documents relating to the business benefits to be derived from the implementation and the efficiencies to be realized from using the application.

RESPONSE: Federal objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case because it seeks “all” documents and is unlimited in time. Federal also objects to this request as vague and overbroad because it seeks all documents “relating to the business benefits” and “efficiencies to be realized from using the application.” Federal also objects to this request as vague and overbroad

because it seeks documents that have no bearing on the claims and defenses in this action. Federal further objects to this request to the extent that it seeks documents and information protected from discovery under the attorney-client privilege and work product doctrine.

REQUEST NO. 68: All documents relating to the decision to implement the application known as Commercial PAS in EUZ, including all documents relating to the business benefits to be derived from the implementation and the efficiencies to be realized from using the application.

RESPONSE: Federal objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case because it seeks “all” documents and is unlimited in time. Federal also objects to this request as vague and overbroad because it seeks all documents “relating to the business benefits” and “efficiencies to be realized from using the application.” Federal also objects to this request as vague and overbroad because it seeks documents that have no bearing on the claims and defenses in this action. Federal further objects to this request to the extent that it seeks documents and information protected from discovery under the attorney-client privilege and work product doctrine.

REQUEST NO. 69: All documents relating to the decision to implement the application known as Claims Connect, including all documents relating to the business benefits to be derived from the implementation and the efficiencies to be realized from using the application.

RESPONSE: Federal objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case because it seeks “all” documents and is unlimited in time. Federal also objects to this request as vague and overbroad because it

seeks all documents “relating to the business benefits” and “efficiencies to be realized from using the application.” Federal also objects to this request as vague and overbroad because it seeks documents that have no bearing on the claims and defenses in this action. Federal further objects to this request to the extent that it seeks documents and information protected from discovery under the attorney-client privilege and work product doctrine.

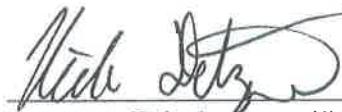
REQUEST NO. 70: All documents relating to the decision to implement the application known as Small Commercial, including all documents relating to the business benefits to be derived from the implementation and the efficiencies to be realized from using the application.

RESPONSE: Federal objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case because it seeks “all” documents and is unlimited in time. Federal also objects to this request as vague and overbroad because it seeks all documents “relating to the business benefits” and “efficiencies to be realized from using the application.” Federal also objects to this request as vague and overbroad because it seeks documents that have no bearing on the claims and defenses in this action. Federal further objects to this request to the extent that it seeks documents and information protected from discovery under the attorney-client privilege and work product doctrine.

REQUEST NO. 71: For each instance in which the Blaze Advisor® software was modified from March 30, 2016 to the present, the documents sufficient to show each modification.

RESPONSE: Federal objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case in seeking “each instance” of any modification to the Blaze software. Federal further objects to this request as vague and overbroad because documents relating to the modification of Blaze software have no bearing on the claims and defenses in this action. Federal further objects to this request as vague and ambiguous in referring to software that is “modified.” Federal further objects to this request to the extent that it seeks documents and information protected from discovery under the attorney-client privilege and work product doctrine. Federal further objects to the extent the request seeks information not in the possession, custody, or control of Federal, and thus exceeds the scope of discovery under Federal Rule 26(b)(1).

Dated: January 29, 2018



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Attorneys for Defendant

63011564

EXHIBIT 32



June 16, 2017

Allen Hinderaker
 Michael A. Erbele
 MERCHANT & GOULD P.C.
 3200 IDS Center
 80 South Eighth Street
 Minneapolis, MN 55402-2215

Via US Mail and E-Mail

Re: Fair Isaac Corporation v. Federal Insurance Company
 Case No. 16-cv-1054 (WMW/DTS)

Dear Al and Michael:

Please see below the custodians, keyword search terms and date restrictions Federal Insurance Company intends to use to locate emails responsive to FICO's document requests. Please let us know as soon as you are able whether you have any objection to this email collection plan.

Search	Custodian	Date Range(s)
FICO or "Fair Isaac" or Blaze	Tamra Pawloski Ramesh Pandey Henry Mirolyuz Pamela Lopata	1/1/2015 to 4/21/2016
FICO or "Fair Isaac" or Blaze	Ewen Setti (UK) Hamish Tonkin (UK) Alexander Pavlenko (Canada) Zorica Todorovic (Canada)	None
(FICO or "Fair Isaac" or Blaze) and (Canada or Toronto or UK or London or England)	Patrick Sullivan Tamra Pawloski	1/1/2012 to 12/31/2012
(FICO or "Fair Isaac" or Blaze) and license	Tamra Pawloski Patrick Sullivan	None
(Sawyer or FICO or "Fair Isaac" or Blaze) and Australia	Henry Mirolyuz Ramesh Pandey	None

Attorneys & Advisors
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 200 South Sixth Street, Suite 4000
 Minneapolis, Minnesota
 55402-1425

Allen Hinderaker
 June 16, 2017
 Page 2

Search	Custodian	Date Range(s)
(Sawyer or FICO or "Fair Isaac" or Blaze) and (London or UK or England)	Henry Mirolyuz	None
(Sawyer or FICO or "Fair Isaac" or Blaze) and (Canada or Toronto)	Henry Mirolyuz	None
(Sawyer or FICO or "Fair Isaac") and Blaze and Demo~	Henry Mirolyuz	None

In its responses to FICO's First Set of Requests for Production of Documents Federal indicated that it would produce documents on a rolling basis and anticipated completing its production by June 30, 2017 or another mutually-acceptable date. We anticipate that we will need approximately thirty (30) days to complete our production after we finalize and run the above email searches.

Please provide us with information regarding any keyword searches FICO intends to employ to collect emails responsive to Federal's document requests and when FICO anticipates completing its production.

Thank you for your attention to this matter.

Sincerely,



Lora M. Friedemann
Direct Dial: 612.492.7185
Email: lfriedemann@fredlaw.com

EXHIBIT 33

HENRY MIROLYUZ - 07/31/2018

5 FAIR ISAAC CORPORATION, a Delaware corporation,

6 Plaintiff,

7 vs.

8 FEDERAL INSURANCE COMPANY, an Indiana corporation,

9 Defendant.

10

11

12 TRANSCRIPT of the stenographic notes of
13 the 30(b)(6) videotaped deposition of Henry Mirolyuz in
14 the above-entitled matter, as taken by and before
15 LORRAINE B. ABATE, a Certified Court Reporter and
16 Notary Public of the State of New Jersey and
17 Registered Professional Reporter, held at the offices
18 of Regus, 55 Madison Avenue, Morristown, New Jersey,
19 on Tuesday, July 31, 2018, commencing at 9:10 a.m.,
20 pursuant to Notice.

21

22

23

24 Job No. MP-182592

25 Pages: 1 - 80

HENRY MIROLUYZ - 07/31/2018

Pages 14..17

Page 14		Page 16	
1	responsibility is I no longer involved with Blaze	1	prospective, we get a request for business, so I'm
2	Advisor software. I'm in charge of architecture of	2	sure the business decides it, but decision process
3	claims applications and systems.	3	is -- we're not involved in that process.
4	Q. When did you stop being involved with	4	Q. Okay.
5	Blaze Advisor?	5	A. So I repeat, we get request from
6	A. Right after the post-merger activities,	6	business to implement such application or such
7	due to the litigations.	7	business roles specifically.
8	Q. Any other additions or changes to the	8	Q. Is there any group within -- you know,
9	resume?	9	business is a broad category. Is there a group
10	A. No.	10	within business from which these requests come?
11	Q. There are a number of acronyms in here	11	A. I don't have such knowledge.
12	and I have to ask you what they mean so I can	12	Q. You don't know?
13	understand the resume.	13	A. I don't know.
14	A. Please do.	14	Q. Okay. To whom do the requests go, do
15	Q. Well, before that, under	15	you know that?
16	accomplishments, you note you have been a guest	16	A. The request goes to my managers. In
17	speaker on multiple FICO World and Business Rules	17	that particular case, would be who I report to.
18	Forum conferences.	18	Q. Would there have been Mr. Pen?
19	On how many occasions were you a guest	19	A. At some point of time, it would be
20	speaker?	20	Mr. Pen. Right now, it would be my manager, Benku
21	A. I believe three or four FICO World	21	Thomas.
22	conferences and one Business Rules Forum which was	22	Q. But you're not involved with the Blaze
23	not FICO specific.	23	Advisor now?
24	Q. And then under professional experience	24	A. Yeah. The response was generic. Any
25	under the heading senior technical analyst, in the	25	requests from business would come to my manager
Page 15		Page 17	
1	second bullet, working with EA. What is EA?	1	first.
2	A. Enterprise architecture team.	2	Q. And you note the best practices for
3	Q. And carrying on with that bullet point,	3	upgrading to Blaze Advisor version 7.1.2. I
4	DM life cycle. What is DM?	4	understand what that means.
5	A. DM, decision management. It's a FICO	5	And the next bullet point, provided SME
6	methodology which was provided to us by FICO.	6	support. What is SME?
7	Q. By FICO?	7	A. Subject matter expert.
8	A. By FICO.	8	Q. Subject matter expert. Support to CAZ.
9	Q. And the next bullet point is worked with	9	What is CAZ?
10	multiple teams across DSO. What is DSO?	10	A. Canadian zone.
11	A. Development services organization. It's	11	Q. AND EUZ?
12	group of people who is involved in the implementation	12	A. European zone --
13	of the application. As an architect, I design the	13	Q. And CSI?
14	application and developers implement the application.	14	A. -- teams.
15	That's such acronym DSO, development services	15	It's Chubb Specialty Insurance. It's
16	organization.	16	line of business or group. It's a division within
17	Q. So I'm going to try that in my words.	17	the company responsible for underwriting the
18	As architect, do you design the application?	18	specialty lines.
19	A. Correct.	19	Q. I didn't get, responsible for
20	Q. And then do the development service	20	underwriting?
21	organization people do the coding?	21	A. Specialty lines.
22	A. Absolutely correct.	22	Q. Specialty lines?
23	Q. Okay. And who decides whether an	23	And in general -- I don't need the
24	application is to be designed using Blaze Advisor?	24	detail, but just to understand, what did you do to
25	A. We would be given -- from IT	25	provide SME support in this regard?